BakerHostetler

August 26, 2021

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VIA ECF

The Honorable Lorna G. Schofield United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States Securities and Exchange Commission v. Qin, et al.; No. 20-cv-10849 (LGS)

Dear Judge Schofield:

We are counsel to Robert A. Musiala Jr., Esq., Court-appointed Receiver in the above-referenced matter. We write pursuant to Your Honor's Order directing the Receiver to file under seal the invoices detailing the work of the Receiver and BakerHostetler, Ankura, and Nelsons, in connection with the Receiver's Certified Initial Fee Application, *see* ECF No. 66, so that the Court may ascertain the specific tasks performed and number of hours billed. *See* ECF No. 78. Consistent with the Court's Order, the Receiver is filing the invoices under seal and redacted versions of the invoices on the public docket. Plaintiff U.S. Securities and Exchange Commission reviewed and approved the invoices prior to the filing of the Receiver's Certified Initial Fee Application.

The Receiver's Certified Initial Fee Application was prepared and submitted in accordance with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the "Billing Instructions").² Pursuant to the Billing Instructions, each time entry contains a task code corresponding to certain legal and financial

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington

¹ See Exs. A–C.

² The Billing Instructions are available at https://www.sec.gov/oiea/Article/billinginstructions.pdf.

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activities, which is displayed on the publicly filed versions of the invoices. The description of these activities is set forth in the Billing Instructions.³

Respectfully submitted,

Teresa M. Goody Guillén

Attachments

cc: All Counsel of Record (via ECF)

Stefan Qin (via email)

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³ See Billing Instructions at 6–7.